



opp-2003-0132

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Public Information and Records Integrity Branch (PIRIB)  
7502C  
Office of Pesticide Programs (OPP)  
Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington DC 20460-0001

Re: Docket OPP-2003-0132

Gentlemen:

As the director of a nonprofit organization serving thousands of people who have had their health and lives ruined by exposure to pesticide, I am appalled that you would consider testing the safety of pesticide on human beings. As you know, large numbers of people are already reported injured by exposure to pesticide every year. And, these numbers do not include those people who have become sensitive to food, chemicals, mold and pollens following exposure to building, yard and agricultural drift pesticide. Not one of the people we serve were injected with or drank pesticide. Their injury was caused by inhalation or dermal contact.

If you sat at my desk for more than one week, you would change your mind about this form of testing. People who are injured by pesticide do not recover. There is no cure. There is no physical help and little compensation given for a ruined life, career, marriage, etc. Those who have been exposed to pesticides causing sensitivity to chemicals, especially, cannot even find shelter they can tolerate. Often times their homes were contaminated by pesticides which forced them to leave. Then it is almost impossible to find housing where someone can avoid exposure to pesticide due to the routine spraying of multiple dwellings, neighbors using herbicides and insecticides, community pest eradication programs and agricultural drift. On top of the impossibility of avoiding pesticide routinely applied in most buildings, yards, roadsides, parks, etc., the now chemical sensitive person cannot tolerate houses which have new paint and new

carpet, nor tolerate the lingering fumes of chemicals used by the former residents such as perfume, air fresheners, carpet cleaner, laundry products, etc. In other words, not only is a person made ill and unable to work by exposure to pesticides, he is a total outcast from life as we know it and suffering all the while!

Do you really want to be responsible for putting research subjects at risk for ruining their lives? Would you do it to yourself? If the subjects report illness immediately or delayed illness, will they be believed? Why would they be believed? Or, will subjects be selected according to their gene/enzyme compatibility to the pesticides to be tested?

Many residents became ill from exposure to pesticides used during community pest eradication programs. Malathion was aerially sprayed over the Los Angeles, San Diego, Riverside and Orange Counties of California in the late 80's and early 90's and in other areas before that. Activists made lists of people who had health injury during the months of spraying. They were not believed. I attended a meeting held by the Dept. of Agriculture in El Monte, California, following the spraying over Los Angeles County. Many people reported temporary symptoms and permanent injury from that exposure. However, other than giving these people a voice in reporting their injury, nothing, absolutely nothing was done to help these people. I know of one woman who lost total control of her nervous system for six months from exposure to the aerially sprayed malathion. She had to live away from the area for six months and needed total care.

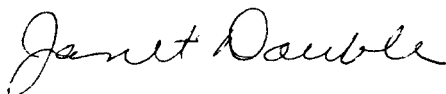
When our troops went to fight the Gulf War in 1990, chemically sensitive people predicted they would suffer health injury if they were exposed to Sarin gas and malathion. When they returned with serious health problems, the government did not believe them. Now thirteen years later, government and private agencies are proving that pesticide exposure caused injury. However, even now, it is controversial.

Before more humans lose their health due to pesticide exposure, especially through research, research should find a cure, not only for acute illness but for the chronic illness it causes.

As a person who has witnessed human suffering due to exposure to toxic chemicals, daily, for over 15 years, I highly recommend you do not test pesticides on humans. Spend the time, money and effort in finding nontoxic alternatives to pesticides, cures for those already injured, and public educational programs to garner understanding and help for the Environmentally Ill.

Please let me know if I can answer any questions. Our telephone number is 661-245-0118.

Sincerely,



Janet Dauble  
Executive Director